United States Department of Agriculture | Food Safety and Inspection Service | Washington, D.C. 20250

MAY 16 2002

Dr. Tony Zohrab
Director, Animal Products
MAF Regulatory Authority
Ministry of Agriculture and Forestry, New Zealand
ASB Bank House, 101-103 the Terrace
Post Office Box 2526
Wellington, New Zealand

Dear Dr. Zohrab:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of New Zealand's meat inspection system from May 23 through June 20, 2001. Enclosed is a copy of the final audit report. New Zealand's comments to the draft final report have been included as Attachment G. Where appropriate, we have made corrections to the body of the report.

We appreciate the promptness with which you addressed the concerns raised in the audit report. I believe our conference call was very useful in clarifying the issues and identifying the corrective and preventative actions that are necessary for their resolution.

Please feel free to contact me at your convenience if you have any questions relative to the audit report or other issues. I can be reached by telephone (202-720-3781), facsimile (202-690-4040), or e-mail (sally.stratmoen@fsis.usda.gov). You may also contact Richard F. Brown by telephone at (202) 690-2679, by fax at (202) 690-4719, or by e-mail at richard.brown@fsis.usda.gov.

Sincerely,

Richard F. Brown

/s/ Sally Stratmoen
Chief, Equivalence Section
International Policy Staff
Office of Policy, Program Development
and Evaluation

Enclosure

cc:

Jason Frost, Counselor, Embassy of New Zealand
David Young, Minister-Counselor, American Embassy, Wellington
Ross Kreamer, FAS Area Officer
Ronald Hicks, Acting Associate Administrator, FSIS
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Country File (New Zealand – FY 2001 Audit)

FSIS:OPPDE:IPS:ES:Gstefan:bw:5/14/02:New Zealand FY2001 Audit

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Food Safety And Inspection Service
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AUDIT REPORT FOR NEW ZEALAND

MAY 23 THROUGH JUNE 20, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of New Zealand's meat inspection system from May 23 through June 20, 2001. Nine of the 71 establishments certified to export meat to the United States were audited. Eight of these were slaughter establishments and one was conducting processing operations.

The last audit of the meat inspection system of New Zealand was conducted in March 2000. Seventy-two establishments were certified for U.S. export at that time; nine of these were audited and all nine were acceptable. Concerns reported at the time were: fecal contamination on a few carcasses in ME23, this was corrected at the time by MAF personnel; broken/cracked conveyor belt in ME78, corrective action was planned at that time by MAF personnel and the establishment personnel; peeling paint and rust spots in the carcass cooler in ME52, corrective action was planned at the time by MAF Officials; floors, doors and lockers were in need of repair, in S237, establishment officials and MAF personnel worked out a repair schedule. All of these deficiencies were corrected at the time of this audit.

From January through April 2001, New Zealand establishments exported 192,294,868 pounds of beef, mutton, lamb and goat to the United States. Port-of-entry (POE) rejections included 65,381 pounds that were rejected for contamination and processing defect.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with New Zealand national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the country's meat inspection headquarters facilities preceding the on-site visits. The third was conducted by on-site visits to establishments. The fourth was a visit to one or more laboratories performing analytical testing of field samples for the national residue testing program, and culturing of field samples for the presence of microbiological contamination.

Program effectiveness determinations focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including

inspection system controls and the testing program for *Salmonella* species. New Zealand's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in six of the nine establishments audited; three establishments, ME 86, ME 32 and ME15, were recommended for re-review. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *Escherichia coli*, are discussed later in this report.

Entrance Meeting

On May 23, 2001, an entrance meeting was held in the Wellington offices of the Food Assurance Authority (FAA) of the Ministry of Agriculture and Forestry (MAF), and was attended by Dr. John Lee, FAA; Dr. Geoff Allen, FAA; Dr. Barry Marshall, FAA; Dr. Roger Cook, FAA; Dr. Mirzet Sabirovic, FAA; Mr. Neil Kiddey, FAA; Ms. Debbie Morris, FAA; Dr. Jeff Taylor, MAF VA; Dr. Luke McLean, MAF VA; Ms Judy Barker, FAA; Ms. Carolyn Andrews, FAA; Mr. David Young, U. S. Embassy, Agricultural Attache; Mr. Steve Benson, U S Embassy Agricultural Analyst and Dr. M. Douglas Parks, International Audit Staff Officer, USDA. Topics of discussion included the following:

1. Finalization of the audit itinerary.

2. The question of ruminant protein being fed to ruminants was discussed and MAF officials assured the auditor that it was against the law in New Zealand.

3. The audit of a farm was projected and the reason for that audit was discussed (residues in live animals).

4. New Zealand officials stated that it was not possible to centralize the records of establishments that were to have a "records only" audit. The records only audits were done on-site in the establishments.

5. The auditor gave the New Zealand officials several forms to be filled out by them and returned to the auditor at the time of the exit conference. These included country profile and questions for the laboratories.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of New Zealand's inspection system in March 2000.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of general inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the inspection system headquarters in Wellington. The records review focused primarily on food safety hazards and included the following:

- Training records for inspectors and laboratory personnel.
- Label approval records and special label claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines, and examples of how new requirements are communicated to field personnel.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis and cysticercosis, and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of non-compliant product, and withholding, suspending, and/or withdrawing inspection services from or delisting an establishment that is certified for U.S. export.
- The national program for field sampling for residue testing program.

No concerns arose as a result the examination of these documents.

Establishment documents from 14 randomly selected establishments that were not scheduled for on-site visits were also audited. These documents included:

- Reports resulting from internal supervisory visits to establishments that were certified for U.S. export.
- Records generated in compliance with Pathogen Reduction requirements (SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing).

The following concerns arose as a result the examination of these documents.

- Preventive action is consistently not being recorded in the SSOP and HACCP programs.
- Carcasses are not being selected randomly for sampling.
- Poison baits for rodent control are put in production related areas such as box storage.
- Critical Control Limits were not measurable; they were judgmental.

Government Oversight

All inspection service inspectors in establishments certified for U.S. export were ASURE employees, receiving no remuneration from either industry or establishment personnel for services rendered in the fulfillment of their national meat/poultry inspection duties. ASURE is a corporation under contract with MAF for the inspection services.

Establishment Audits

Seventy-one establishments were certified to export meat to the United States at the time this audit was conducted. Nine of these were randomly selected to be visited for on-site audits. In all of the nine establishments visited, MAF inspection system controls and establishment system controls were both in place to prevent, detect and control contamination and adulteration of products, however, three establishments were placed on re-review. They are ME15, ME32 and ME86. Details of the audit findings pertaining to these three establishments are discussed in the Slaughter/Processing Controls section of this report.

Laboratory Audits

During laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories, intra-laboratory quality assurance procedures, including sample handling; and methodology.

The National Chemical Residue Laboratory in Upper Hutt was audited on June 12, 2001. Effective controls were in place for sample handling, sampling frequency, timely analysis, data reporting, analytical methodologies, tissue matrices for analysis, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions The methods used for the analyses were acceptable. No compositing of samples was done.

New Zealand's microbiological testing for *E. coli* and *Salmonella* was being performed in private laboratories. One of these, the MLS Envirolab in Invercargill, was audited. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories were accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses were being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the nine establishments audited on-site:

Establishments ME42, ME47 and ME86: beef and sheep slaughter and boning
Establishments ME09, ME15, ME32 and ME1253: beef slaughter and boning
Establishment ME50: sheep slaughter and boning
Establishment ME113: sheep, goat and deer boning

In addition, the following operations were being conducted in the fourteen establishments for which only records were audited:

Establishments ME21, ME26, ME39, and ME56: beef and sheep slaughter and boning
Establishments ME23, ME43, ME66, ME70, ME82, ME124 and ME127: Beef slaughter and boning
Establishment ME100: beef and horse slaughter and boning.
Establishment PH490: beef and sheep boning.
Establishment PH71: sheep boning.

SANITATION CONTROLS

Sanitation Standard Operating Procedures (SSOPs)

Based on the on-site audits of establishments, New Zealand's inspection system had controls in place for basic establishment facilities, condition of facilities and equipment, product protection and handling and establishment sanitation programs.

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements with the following exception:

- Preventive action is not recorded in almost all establishments.

ANIMAL DISEASE CONTROLS

New Zealand's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

A consultation was carried out with an official of AgriQuality who reports to MAF Biosecurity Authority (MAF BA), which is responsible for animal diseases. Some of their present activities deal with Tuberculosis, Brucellosis, Foot and Mouth Disease, and Bovine Spongiform Encephalopathy. These programs are in the forefront because of their danger to public health and for economic reasons.

RESIDUE CONTROLS

New Zealand's National Residue Testing Plan for 2001 was being followed and was on schedule. The New Zealand inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

A visit to a farm was carried out for inquiry into the handling of animals that are treated on-farm and how records of individual animals are kept for withdrawal periods before submission to the slaughter establishments and the use of drugs, control of pesticides and animal identification. Consultations were with the farm owners, the attending veterinarian and MAF Officials. The findings were all satisfactory.

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the New Zealand inspection system had controls in place to ensure adequate product protection and processed product control:

1. Establishment ME15: The floor cleaning person was also working the carcass detain rail without changing clothes. The buccal cavity was washed after opening the cavity thus exposing the cut surfaces of edible product to ingesta. The anal cut was continued into other tissues without first sanitizing the knife. The moving viscera table had residues of previous uses. The Halal bleeding bars were not cleaned and sanitized between uses. There is an area of common touch of some carcasses after the split saw. Poison rodent baits were located in the box storage room.

2. Establishment ME32: The anal cut was continued into other tissues without first sanitizing the knife. In the carcass cooler, feces were observed on two of 25

carcasses examined. In the HACCP program, the critical control limits were not measurable, they were judgmental.

3. Establishment ME86: Urine spillage was seen on carcasses during the dressing procedure and was not removed. Some observed carcasses' front legs touched the condemned product chute at the final rail. Condensate was dripping into the trafficway of an exposed product handler. No rodent monitoring devices in the plant.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B). One problem was seen generally and is noted below:

1. Preventive action was not being recorded.

The HACCP programs were found to meet the basic FSIS regulatory requirements. A hazard analysis was performed at each establishment. However, boning establishments did not identify any hazards and, therefore, did not establish any critical control points.

Testing for Generic *E. coli*

New Zealand has adopted the FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent measures:

1. GENERIC *E. COLI* TESTING STRATEGY: Frequency of Testing. The criteria used for equivalence decisions for determining whether a different testing frequency for generic *E. coli* testing is equivalent are:
   - Testing frequency is based on production volume with at least one test per week.
   - The predominant class of animals slaughtered in an establishment is sampled.

2. SAMPLING SITES: Location of Sampling Sites. New Zealand samples cattle at three sites: flank, brisket, and outside hind leg (as written in the equivalence evaluation document). The criteria used for making equivalence decisions for determining whether different sample sites for *E. coli* testing is equivalent are:
   - The sample sites include the sites most likely to be contaminated with fecal contamination.
   - The sample sites encompass a large enough surface area to ensure that the effectiveness of the slaughter process controls will be evaluated.
   - The sample sites provide the same probability of detecting the presence of fecal contamination as the FSIS sample sites.

3. SAMPLING TOOLS. New Zealand uses a swab-sampling tool. The criteria used for making equivalence decisions for approval of alternative sampling tools for sampling for *E. coli* are:
   - The tool is a traditional generally recognized sample collection tool for sampling for *E. coli* on meat or poultry surfaces.
   - The tool is sensitive enough to gather *E. coli* present on the sample site.
   - The tool does not contaminate the surfaces of the carcass.

If the carcass for testing is selected randomly, they can sample one side for *E. coli* and the other side for *Salmonella*; thus taking samples on alternating sides.

Eight of the establishments audited conducted slaughter operations and were therefore required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The generic *E. coli* testing programs were found to meet the basic FSIS regulatory requirements. The following deficiency was observed.

1. Carcasses were not selected randomly.

Additionally, establishments had adequate controls in place to prevent meat products intended for New Zealand domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

New Zealand's inspection system controls [ante- and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Eight of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

New Zealand has adopted the FSIS regulatory requirements for *Salmonella* testing with exception of the following equivalent measures:

1. SAMPLE COLLECTOR: Establishments take samples. The criteria used for equivalence decisions for use of establishment employees in lieu of government employees are:
   - MAF develops a written, national sampling plan and enforces a national *Salmonella* testing program for sample collection and processing that is followed in all New Zealand establishments that export meat products to the United States.
   - Sample collection procedures are directly reviewed via specific tasks that are assigned to a trained on-site veterinarian from MAF Verification Agency. The accredited lab and the non-government accreditation authority (MILAB) are responsible for ensuring correct sampling procedures. MAF Food (Compliance) performs periodic audits of MILAB and MAF Verification, including the oversight and monitoring activities of the sample collector. MAF Food (Animal Products) has mandatory access to all microbiological test results, including *Salmonella* test results. The on-site MAF Verification Agency Veterinarian also has direct access to all *Salmonella* test results.
   - MAF uses *Salmonella* test results to monitor the performance of each establishment over time.
   - The government of New Zealand (MAF) takes immediate action any time an establishment fails to meet a *Salmonella* performance standard.

2. LABORATORIES: Private Laboratories. The criteria used for equivalence decisions for the use of private laboratories in lieu of government laboratories are:

- The laboratory must be accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
- The laboratory must have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
- Results of analyses must be reported to the government or simultaneously to the government and establishment.

The government of New Zealand addresses these requirements as follows:

- The laboratories are independent non-government, or establishment laboratories that are all accredited by a government accreditation authority (MILAB). MILAB, in turn, is audited bi-annually by MAF FOOD (Compliance). MILAB standards are set by MAF Food (Animal Products). All laboratories are assessed to ISO 25 standards. MILAB

accreditation and responsibilities are audited bi-annually and at the request of MAF Food (Animal Products) by MAF Food (Compliance).

- The Inter-laboratory Comparison Program is a government program that conducts monthly proficiency tests with each accredited laboratory and is accredited to ISO 9000 and ISO Guide 43.
- The accreditation program is mandated, established, and regulated by MAF Food (Animal Products).
- All accredited laboratories have a formal program which ensures that laboratory personnel are properly trained, that there are suitable facilities and equipment, that there is a written quality assurance program, and that there are adequate reporting and record keeping facilities.
- Test results are reported directly to establishment personnel who in turn report them to MAF inspection personnel.

3. SAMPLING TOOLS: The swab tool method of sample collection is used. The criteria used for making decisions for approval of an alternative sampling tool for sampling for *Salmonella* are:
   - The tool is an internationally recognized sample collection tool for sampling *Salmonella* on meat or poultry products.
   - The swab is sensitive enough to gather an adequate quantity of the *Salmonella* that are present at the sample sites.
   - The swab does not contaminate surfaces of the carcass.

4. SAMPLING TECHNIQUES; if the carcass for testing is selected randomly, they can sample one side for *E. coli* and the other side for *Salmonella*; thus taking samples on alternating sides. Time of collection of samples. The criteria used for making equivalence decisions for determining whether a different time for sample collection is equivalent are: Samples are taken at the end of the slaughter or production process. Samples are taken prior to the carcass being cut and /or packaged.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements with the following exceptions:

1. The carcasses were not randomly selected in six establishments.
2. The sampling is done in some establishments by Asure personnel.

Species Verification

At the time of this audit, New Zealand was not exempt from the species verification-testing requirement. The auditor verified that species verification was being conducted in accordance with FSIS requirements.

Monthly Reviews

These reviews were being performed by the New Zealand equivalent of Circuit Supervisors. All have many years of experience. Dr. Chris Mawson was in charge of the establishments on the North Island, and Dr. Goeff Taylor was in charge of the establishments on the South Island.

The internal review program was applied equally to both export and non-export establishments. Internal review visits were not always announced in advance, and were conducted, at times by individuals and at other times by a team of reviewers, at least once monthly. When in the opinion of the auditor, a good record is established, the audit interval may be lengthened to 2 or 3 months. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central MAF offices in Wellington, and were routinely maintained on file

In the event that an establishment is found, to be out of compliance with U.S. requirements during one of these internal reviews, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, an auditor or a team is empowered to conduct an in-depth review, and the results are reported to Drs. Mawson or Taylor for evaluation; they formulate a plan for corrective actions and preventive measures. This plan must be in place before re-instatement is done.

Enforcement Activities

Total investigations since April 2000 is 627, prosecution details are as follows:

May 31, 2001 – Selling uninspected meat four times. Charges under Meat act 1981-s9 (1) and 47(1)(a). Pleaded guilty in Hamilton District Court and was fined $6000 plus $520 court costs and Solicitors fees of $250.

There are three pending cases at the present time as follows:

1. illegal possession and sale of uninspected meat
2. bobby calf residue violation (2 cases).

New Zealand officials stated that people convicted of a felony meat violation would be allowed to reenter the meat business when their debt to society had been paid (fine and/or incarceration).

Exit Meetings

An exit meeting was conducted in Wellington on June 20, 2001. The New Zealand participants were Dr. Tony Zohrab, MAF Director Animal Products; Dr. Roger Cook, MAF Microbiology; Dr. Goeff Allen, MAF Compliance Director; Dr. Chris Mawson, MAF VA

Director; Dr. Luke McLean, MAF QA; Dr. Mirzet Sabirovic, MAF; Mr. Niel Kiddey, MAF Compliance; Ms. Judy Barker, MAF; Dr. Phil Ward, MAF Europe Market Access; Mr. Dennis Butler, Meat Industry Standards Council; Mr. Stephen Benson, U S Embassy, Agriculture Analyst; Ms. Carolyn Andrews, MAF and Dr. M. Douglas Parks, International Audit Staff Officer, USDA.

The following topics were discussed:

1. Ratings of establishments and deficiencies. The records-only audits revealed that PH 490 and PH71 had no HACCP programs in place. A hazard analysis was done but revealed no hazards that led to CCPs. There was a discussion about this and Dr. Zohrab presented evidence to support their viewpoint that no CCP is mandated. His contention was that the equivalence determination already done allowed them to accept the no CCP situation. No agreement on this point was reached and will be handled by the International Policy Staff in Washington, D.C.
2. Compliance and enforcement. New Zealand officials said that people convicted of a felony meat violation would be allowed to reenter the meat business when their debt to society had been paid (fine and/or incarceration).
3. The auditor collected the documents requested at the entrance meeting.
4. Urine spillage on sheep was discussed and the New Zealand officials stated that this was not acceptable and that they would manage the problem.
5. Preventive action in the SSOP and HACCP programs was not recorded in almost all plants. The New Zealand officials acknowledged this problem and pledged to correct the matter immediately.
6. The random selection of the carcasses for *E. coli* and *Salmonella* testing was not done in almost all establishments. It was agreed that industry and New Zealand officials would be reminded of the requirements, and guidance provided for implementation.
7. Poison baits for rodents in production related areas such as box storage was discussed and the response was that they would look into the matter and communicate their findings.
8. For *E. coli* and *Salmonella* testing methods they stated they would supply a copy for equivalence determination of the methods of the NMD and MIRINZ 873 , which are the methods they are using at the present time.
9. Some critical control points in various parts of the programs were not a measurable entity and were a judgment matter in many establishments. Tony Zohrab agreed that this issue needed further investigation and clarification and improved guidance provided to industry.
10. In *Salmonella* testing, the carcass selection is done as the other half of the carcass that is selected for *E. coli* testing (which is not selected randomly). They stated that their procedure was equivalent and said they would provide supporting evidence.
11. The removal and discarding of small stock (sheep and goats) heads before inspection was discussed and Tony Zohrab said that an equivalence had been granted and that he would see if they could find the letter from the International Policy Staff concerning this matter and supply a copy.
12. The deficiencies in the three establishments that were classified as acceptable/re-review

(ME15, ME32, and ME86) were discussed and all were addressed in a satisfactory manner.

CONCLUSION

The inspection system of New Zealand was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Major concerns were: SSOP and HACCP plans did not include the records of preventative action taken; Slaughter—Processing deficiencies in Establishments ME15, MEQ32 and ME86 (see section so titled for details); HACCP plans in processing only plants did not have any critical control points; carcasses for *E. coli* and *Salmonella* testing were not selected randomly. Nine establishments were audited: six were acceptable, and three were evaluated as acceptable/re-review. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction.

Dr. .M. Douglas Parks
International Audit Staff Officer

(signed)Dr. .M. Douglas Parks

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Forms
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
86	√	√	√	√	√	√	√	√
32	√	√	√	√	√	√	√	√
09	√	√	√	√	√	√	√	√
47	√	√	√	√	√	√	√	√
125	√	√	√	√	√	√	√	√
15	√	√	√	√	√	√	√	√
113	√	√	√	√	√	√	√	√
50	√	√	√	√	√	√	no	√
42	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

39	√	√	√	√	√	√	√	√
43	√	√	√	√	√	√	√	√
82	√	√	√	√	√	√	no	no
100	√	√	√	√	√	√	√	√
127	√	√	√	√	√	√	no	√
124	√	√	√	√	√	√	√	√
23	√	√	√	√	√	√	√	√
490	√	√	√	√	√	√	√	√
70	√	√	√	√	√	√	√	no
26	√	√	√	√	√	√	√	√
21	√	√	√	√	√	√	√	no
56	√	√	√	√	√	√	no	√
71	√	√	√	√	√	√	√	no
66	√	√	√	√	√	√	no	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing and documenting pre-shipment document reviews as required.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Haz. analysis –all ID'ed	3. Use & users includ-ed	4. Plan for each hazard	5. CCPs for all hazards	6. Mon-itoring is spec-ified	7. Corr. actions are des-cribed	8. Plan valida-ted	9. Ade-quate verific. proced-ures	10. Ade-quate docu-menta-tion	11. Dat-ed and signed	12. Pre-ship-ment doc. re-views
86	√	√	√	√	√	√	√	√	√	√	no	√
32	no	√	√	√	√	√	no	√	√	√	√	√
09	√	√	√	√	√	√	√	√	√	√	√	√
47	√	√	√	√	√	√	no	√	no	√	√	√
125	√	√	√	√	√	√	no	√	√	√	√	√
15	√	√	√	√	√	√	no	√	√	√	no	√
113	no	ccp	no	plan								
50	√	√	√	√	√	√	no	√	√	√	√	√
42	√	√	√	√	√	√	no	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

39	√	√	√	√	√	√	no	√	√	√	√	√
43	√	√	√	√	√	√	no	√	√	√	√	√
82	√	√	√	√	√	√	no	√	√	√	no	√
100	√	no	√	√	√	√	no	√	√	√	√	√
127	√	√	√	√	√	√	no	√	√	√	√	√
124	√	√	√	√	√	√	no	√	√	√	√	√
23	√	√	√	√	√	√	no	√	√	√	√	√
490	no	ccp	no	plan								
70	√	√	√	√	√	√	no	√	√	√	√	√
26	√	√	√	√	√	√	no	√	√	√	√	√
21	√	√	√	√	√	√	no	√	√	√	√	√
56	√	√	√	√	√	√	no	√	√	√	√	√
71	no	ccp	no	plan								
66	√	√	√	√	√	√	√	√	√	√	√	√

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
86	√	√	√	√	√	√	no	√	√	√
32	√	√	√	√	√	√	√	√	√	√
09	√	√	√	√	√	√	no	√	√	√
47	√	√	√	√	√	√	no	√	√	√
125	√	√	√	√	√	√	√	√	√	√
15	√	no	√	√	√	√	no	√	√	√
113	bone	only								
50	√	√	√	√	√	√	no	√	√	√
42	√	√		√	√	√	no	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

39	√	√	√	√	√	√	√	√	√	√
43	√	√	√	√	√	√	no	√	√	√
82	√	√	no	√	√	√	√	√	√	√
100	√	√	√	√	√	√	no	√	√	√
127	√	√	√	√	√	√	√	√	√	√
124	√	√	no	√	√	√	√	√	√	√
23	√	√	no	√	√	√	no	√	√	√
490	bone	only								
70	√	√	no	√	√	√	no	√	√	√
26	√	√	no	√	√	√	no	√	√	√
21	√	√	√	√	√	√	no	√	√	√
56	ran	out	of	time						
71	bone	only								
66	√	√	√	√	√	√	no	√	√	√

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
86	√	√	N/A	no	√	√
32	√	√	N/A	no	√	√
09	√	√	N/A	no	√	√
47	√	√	N/A	no	√	√
125	√	√	N/A	no	√	√
15	√	√	N/A	no	√	√
113	bone	only				
50	√	√	N/A	no	√	√
42	√	√	N/A	no	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

39	√	√	N/A	√	√	√
43	√	√	N/A	√	√	√
82	√	√	N/A	√	√	√
100	√	√	N/A	√	√	√
127	√	√	N/A	√	√	√
124	√	√	N/A	√	√	√
23	√	√	N/A	√	√	√
490	boning	only				
70	√	√	N/A	√	√	√
26	√	√	N/A	√	√	√
21	√	√		√	√	√
56	ran	out	of	time		
71	boning	only				
66	√	√	N/A	√	√	√

Attachment E

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
June 12, 2001	MLS Envirolab

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Ministry of Agriculture and Forestry	Wellington, New Zealand	142 Esk Street Invercargill, New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. M. Douglas Parks	Mr. Dudley Morrison

	REVIEW ITEMS	ITEM #	EVALUATION CODE	Residue Code/Name ▶	E coli	Sulfa									
SAMPLING PROCEDURES	Sample Handling	01			A	A									
	Sampling Frequency	02			A	A									
	Timely Analyses	03			A	A									
	Compositing Procedure	04			O	O									
	Interpret Comp Data	05			O	O									
	Data Reporting	06			A	A									
ANALYTICAL PROCEDURES	Acceptable Method	07			A	A									
	Correct Tissue(s)	08			A	A									
	Equipment Operation	09			A	A									
	Instrument Printouts	10			A	A									
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11			O	O									
	Recovery Frequency	12			O	O									
	Percent Recovery	13			O	O									
	Check Sample Frequency	14			A	A									
	All analyst w/Check Samples	15			A	A									
	Corrective Actions	16			A	A									
	International Check Samples	17			A	A									
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE												
OTHER REVIEW		19	EVAL. CODE												
		20													

SIGNATURE OF REVIEWER: M Douglas Parks

DATE: June 12, 2001

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	June 12, 2001	MLS Envirolab

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Ministry of Agriculture and Forestry	Wellington, New Zealand	142 Esak Street Invercargill, New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. M. Douglas Parks	Mr. Dudley Morrison

This a private contract laboratory.

Accreditation is by IANZ

Three year interval for laboratory.

Annual reassessments for all analysts

Microbiology is done at this laboratory, no residues.

Quality Assurance Program.

E. coli--Controls are done each week and on each new batch of Petrifilm.

Samples are run monthly by Agriquality Proficiency Program.

Both inoculated and uninoculated samplea are provided.

Salmonella--Agriquality Proficiency Program runs a Salmonella program every second month.

Four samples are analysed each time by the analyst for the month.

Both inoculated and uninoculated samples may be in each round of testing.

All positive sampoles are reported to MAF and to the personnel at the establishment.

Attachment E

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
June 19, 2001	National Chemical Residue Laboratory Agriquality New Zealand Limited

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Ministry of Agriculture and Forestry	Wellington, New Zealand	Wallaceville Animal Research Centre 62 Ward Street Upper Hutt, New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. M. Douglas Parks	Dr. Mirzet Sabirovic & Mr. Neil Kiddey

	REVIEW ITEMS	ITEM #	EVALUATION CODE	100	200	300	400	500	600	700	800	900			
SAMPLING PROCEDURES	Sample Handling	01		A	A	A	A	A	A	A	A	A			
	Sampling Frequency	02		A	A	A	A	A	A	A	A	A			
	Timely Analyses	03		A	A	A	A	A	A	A	A	A			
	Compositing Procedure	04		A	A	A	A	A	A	A	A	A			
	Interpret Comp Data	05		A	A	A	A	A	A	A	A	A			
	Data Reporting	06		A	A	A	A	A	A	A	A	A			
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A	A	A	A	A	A	A	A			
	Correct Tissue(s)	08		A	A	A	A	A	A	A	A	A			
	Equipment Operation	09		A	A	A	A	A	A	A	A	A			
	Instrument Printouts	10		A	A	A	A	A	A	A	A	A			
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	A	A	A	A	A	A	A	A			
	Recovery Frequency	12		A	A	A	A	A	A	A	A	A			
	Percent Recovery	13		A	A	A	A	A	A	A	A	A			
	Check Sample Frequency	14		A	A	A	A	A	A	A	A	A			
	All analyst w/Check Samples	15		A	A	A	A	A	A	A	A	A			
	Corrective Actions	16		A	A	A	A	A	A	A	A	A			
	International Check Samples	17		A	A	A	A	A	A	A	A	A			
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	0	0	0	0	0	0	0	0	0	0		
OTHER REVIEW		19	EVAL. CODE												
		20													

SIGNATURE OF REVIEWER M Douglas Parks

DATE June 19, 2001

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE June 19, 2001	NAME OF FOREIGN LABORATORY National Chemical Residue Laboratory Agriquality New Zealand Limited
FOREIGN GOV'T AGENCY Ministry of Agriculture and Forestry	CITY & COUNTRY Wellington, New Zealand	ADDRESS OF LABORATORY Wallaceville Animal Research Centre 62 Ward Street Upper Hutt, New Zealand
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Mirzet Sabirovic & Mr. Neil Kiddey	

RESIDUE CODES	ITEM NO.	COMMENTS
		Accreditation is done be IANZ Annual surveillance assessment Three-year full technical reassessment This a residue testing Laboratory. Quality Assurance Program Blind spikes are done for all analysts for all common compounds annually. Blind testing is done with Australia--four times a year. Blind testing is done with United Kingdom--two times a year. Blind testing is done with the United States--two times a year. Some samples are held until a group is assembled Chloramphenicol until 38 samples are accumulated. Clenbuterol samples are accumulated for 23 days. Steriod screening tests are done on 20 samples or 23 days. The whole program has a built-in 15% excess sampling rate to allow for bad or lost samples. All personnel are fully qualified as per accreditation orginzation.

Attachment F

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS **FOREIGN PLANT REVIEW FORM**	REVIEW DATE June 13, 2001	ESTABLISHMENT NO. AND NAME Alliance Group ME50	CITY Invercargill COUNTRY New Zealand
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Mr. Dudley Morrison	EVALUATION [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable	

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 M	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 U	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	June 13, 2001	Alliance Group ME50	Invercargill
			COUNTRY New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Mr. Dudley Morrison	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

27--Contaminated skin around the anus is pushed into the pelvic canal during the dressing procedure.

29--The moving visera table was coming up with residues of the previous use.

SSOP--No preventative action recorded.

SSOP--Operational sanitation results only pairtally recorded.

HACCP--Not all CCP's are measurable some are judgemental.

E.coli--Carcasses nor selected randomly.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
June 11, 2001	PPCS Silverstream ME113	Dunedin
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Jack Pociecha and Mr Neil Kiddey	[X] Acceptable [ ] Acceptable/Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 M	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	June 11, 2001	PPCS Silverstream ME113	Dunedin
			COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Jack Pociecha and Mr Neil Kiddey	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

51--Many carcasses had fragments of wool after the pretrim station.

SSOP--No preventativ e action recorded.

HACCP--No CCP in the plan.

This is a boning room only, no slaughter.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
June 7,2001	CFM Belfast ME15	Christchurch
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Mr. Dudley Morrison	☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 U	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 U	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
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Pest control program	08 M	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
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Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 M	Ingredients identification	53 A		
Sanitary dressing procedures	27 M	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	June 7,2001	CFM Belfast M 815	Christchurch
			COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Mr. Dudley Morrison	☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable

COMMENTS:

26--The floor cleaning person was also working on the detain rail without changing clothes.

27--The buccal cavity was washed after opening the cavity thus subjecting cut surfaces of edible porduct to ingesta.

28--The anal cut was continued into other tissues without first sanitizing the knife.

29--The moving visera table had residues of the previous use.

29--The Halal bleeding bars were not cleaned and sanitized between carcasses.

29--There is an area of common touch of many carcasses right after the carcass saw.

08--Poison baits in box storage.

SSOP--Signature and date on program is outdated.

SSOP--No preventastive action recorded.

HACCP--Signature and date not current on program.

HACCP--CCL is not measurable it is judgemental.

HACCP--No preventative action recorded.

E.coli--The procedure does not designate the employee(s) responsible to collect the samples.

E.coli--Carcasses are not selected randomly.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
June 5, 2001	Richmond ME125	Dargaville
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Jack Pociecha	[X] Acceptable [ ] Acceptable/Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 M	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 A
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 M	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 M	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 OA
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 M	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	June 5, 2001	Richmond ME125	Dargaville
			COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Jack Pociecha	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

19--Employees were washing product contact knoves in the hand wash sinks.

19--Visera buggy contained residues of the previous use.

29--Post mortem inspector usedaa knife on a condemned liver and then on other edible tissues without sanitizing the knife.

51--Rail grease was observed on a carcass after pre-trim was completed.

08--Poison rodent baits were in the box storage room.

SSOP--no preventative action recorded.

HACCP--CCl's are judgemental not measureable.

HACCP--No preventative action recorded.

Establishment supervisor was giving instructions directly to the inspector on the final rail.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
Jun 1,2001	AFFCO Moerewa	Moerewa
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Lindsay Nicholls	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
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Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
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Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	Jun 1,2001	AFFCO Moerewa	Moerewa
			COUNTRY New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Lindsay Nicholls	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

17--Dripping condensate observed in Carcass cooler(not product contact).

19--Exposed product contact trays were cracked.

25--Neck cutter was not washing blood that contacted knife opening from apron betaeen carcasses.

SSOP--No overall on-site authority signature or date on program.

SSOP--No preventative action recorded.

HACCP--No preventative action recorded.

HACCP--Critical limits not clear.

HACCP--No verification methods listed.

E.coli--Carcesses are not selected randomly.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
May 29, 2001	Richmond ME09	Hawera
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Mr. Dudley Morrison	[X] Acceptable [ ] Acceptable/Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	May 29, 2001	Richmond ME09	Hawera
			COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Mr. Dudley Morrison	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

18--The overheads had residues of previous day's operation above exposed product at the final trim rail.

27--Not flushing buccal cavity nor nasal passages prior to harvesting product from the head.

28--Employee was cutting across the anus and continuing the cut into other tissues without sanitizing knife.

SSOP--Preventative action not recorded.

E. coli--Procedure does not designate the plant location for sample collecting.

E.coli--carcass selection is not random.

HACCP--No preventative action recorded.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
May 25, 2001	AFFCO ME32	Fielding
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Lindsay Nicholls	☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 U	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
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Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	May 25, 2001	AFFCO ME32	Fielding
			COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Lindsay Nicholls	☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable

COMMENTS:

27--Employee cutting across anus and continuing cut into other tissues without sanitizing knife.

28-- In the carcass cooler feces was observed on 2 carcasses of 25 examined.

SSOP--Preventative action not recorded.

HACCP--The flow chart was not complete.

HACCP-- The CCP's were not measurable they were judgemental.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
May 24, 2001	Taylor Preston ME86	Wellington
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Lindsay Nicholls	☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable

CODES (Give an appropriate code for each review item listed below)
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Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 O
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Pest control program	08 M	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	May 24, 2001	Taylor Preston ME86	Wellington
			COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M. Douglas Parks	Dr. Lindsay Nicholls	☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable

COMMENTS:

27--Urine spillage onto carcasses during dressing and not removed or sent to the trim rail.

28--Some carcass front legs touch the condemn product chute at the final trim rail.

28--In the carcass cooler feces was observed on 6 of 25 carcasses examined of 480 available.

17--Condensate was dripping into the trafficway of an exposed product handler.

08--No rodent monitoring devices in the plant.

SSOP--Program not signed by the overall on-site authority.

SSOP--very poor recording of preventative action.

HACCP--Program not signed and dated by overall on-site authority.

HACCP--Preventative action not recorded.

E.coli--Carcass selection is not random.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
June 14,2001	AFFCO Wairoa ME42	Waiora
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M.Douglas parks	Dr. Ziggy Bojarski	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
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Sanitary dressing procedures	27 M	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	June 14,2001	AFFCO Wairoa ME42	Waiora
			COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. M.Douglas parks	Dr. Ziggy Bojarski	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

18--Condensate was dripping into the head trafficway.

27--Contaminated skin around the anus was pushed into the pelvic canal during dressing procedure.

27--The throat opening was done with contaminated thumb.

28--Common touch area to most carcasses after the skinner.

29--Weasand rod was not kept sanitized between uses.

SSOP--No preventative action recorded.

HACCP--The CCP's are not measurable they are judgemental.

HACCP--No preventative action recorded.

E.coli--carcasses not selected randomly.

Attachment G

Ministry of Agriculture and Forestry, New Zealand
Te Manatu Ahuwhenua, Ngaherehere, Aotearoa

Ref: M-USA000

8 March 2002

Sally Stratmoen
Chief, Equivalence Section
International Policy Staff
Office of Policy, Program Development and Evaluation
1400 Independence Avenue SW
Washington DC, 20250
UNITED STATES OF AMERICA

Dear Sally

DRAFT FINAL AUDIT REPORT

Thank you for the opportunity of responding to the Draft Final Audit Report for the Food Safety Inspection Service on-site audit of the New Zealand meat inspection system conducted from 23 May 2001 to 20 June 2001.

I would like to express our overall satisfaction at the general conclusions of the audit report as being a true reflection of the performance of the New Zealand programme.

In order to address the issues of random selection of carcasses, documentation of selection procedures, and recording of selection results for microbiological sampling, MAF Food has rewritten the National Microbiological Database (NMD) procedures manual to clarify and reiterate these requirements. Industry and government verifiers have been reminded of these requirements.

Appended, as Annex I to this letter is a two-part document. The first part of the document is a summary that responds to the points from the exit meeting which appear on page 12 of the report. The second part provides comments which relate to the body of the report. These comments are generally editorial in nature, but also identify some areas covered by the report for which New Zealand is able to assist by providing additional information and clarification. We have also provided supplementary documents (refer Annexes II - IV) to assist in the clarification of other issues raised in your covering letter to the Draft.

Annex II, titled: "Suitability of Persons to be involved in Meat and other Animal Product Processing Operations", outlines the legislative powers available under the Animal Products Act 1999 and addresses the comment: "New Zealand does not have a way to prohibit persons where integrity is an issue, such as persons convicted of bribery, to own or operate establishments that are certified to export to the U.S." This document also provides comment

in relation to the Meat Act 1981, which following a transition period, will be replaced in its entirety by the Animal Products Act 1999.

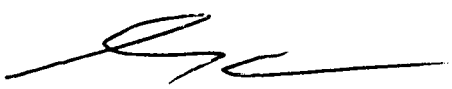
Annex III, is titled: "Summary of Amendments to NMD Technical Procedures and the NMD Technical Procedures Manuals". This document provides additional information over and above the comments we have provided for the report and addresses the comment: "The analytical methods used for determining the presence of generic *Escherichia coli* (*E. coli)* and *Salmonella* were changed without FSIS notification and approval".

MAF Food response with regard to the auditor's comment "the critical control limits were not measurable, they were judgemental." are presented in Annex IV. This appendix incorporates NZ comment with regard to measurability, excerpts from *A Guide to HACCP Systems in the Meat Industry, Appendix IX.2: Slaughter and Inverted Dressing of Sheep and Lambs, and Appendix IX.1: Cattle Slaughter and Dressing.* It also includes some photographs which were issued for industry guidance to assist with defining acceptable parameters for the limits of roll-in during shoulder pelt opening operations in ovines.

With regard to boning establishments, which had not identified any CCPs, New Zealand undertakes to ensure that, stand alone boning and cutting premises that are certified to export to the USA, will have a CCP identified by the end of June 2002.

I trust that this information assists in clarifying and resolving matters identified by the auditor. Please feel free to contact me should you want further information.

Yours sincerely



Dr Tony Zohrab
Director Animal Products
MAF Food Assurance Authority

ANNEX I

PART 1

Summary of New Zealand Response to Topics Discussed at Exit Meeting

(The New Zealand response where appropriate appears in italics beneath the Draft Audit Report listed topic.)

1 Ratings of establishments and deficiencies. The records-only audits revealed that PH 490 and PH71 had no HACCP programs in place. A hazard analysis was done but revealed no hazards. There was discussion about this and Dr. Zohrab presented evidence to support their viewpoint that no CCP is mandated. His contention was that the equivalence determination already done allowed them to accept the no CCP situation. No agreement on this point was reached and will be handled by the International Policy Staff in Washington D.C.

The above New Zealand premises have performed hazard identification and analysis. Hazards identified are currently being managed by GMP. It is the New Zealand view that they are adequately covered. Notwithstanding this view, and without prejudice to the FSIS-recognised equivalence of New Zealand HACCP, we undertake to ensure that stand alone boning and cutting establishments will have at least one CCP identified by the end of June 2002 for market access purposes.

2 Compliance and enforcement. New Zealand officials said that people convicted of a felony meat violation would be allowed to re-enter the meat business when their debt to society had been paid (fine/or incarceration).

New Zealand has measures in place particularly under the new Animal Products Act 1999. Refer Annex II.

3 The auditor collected the documents requested at the entrance meeting.

4 Urine spillage on sheep was discussed and the New Zealand officials stated that this was not acceptable and that they would manage the problem.

New Zealand accepts that urine is a contaminant and has initiated measures to address this issue.

5 Preventive action in the SSOP and HACCP programs was not recorded in almost all plants. The New Zealand officials acknowledged this problem and pledged to correct the matter immediately.

New Zealand accepts that keeping records of preventive actions is essential and has reinforced the necessity to do so with the industry.

6 The random selection of carcasses for *E. coli* and *Salmonella* testing was not done in almost all establishments. It was agreed that industry and New Zealand officials would be reminded of the requirements. and guidance provided for implementation.

The NMD has always required carcasses to be randomly selected for sampling. Premises audited were randomly selecting the class of stock to be sampled, the day of sampling, the shift of sampling and the run (2 hour period) from which individual carcasses would be sampled. However, carcasses were not being randomly selected within a run. The NMD manual has been rewritten to provide clarification and reiterate the requirements for random selection. Refer to Annex III

7 Poison baits for rodents in production related areas such as box storage was discussed and the response was that they would look into the matter and communicate their findings.

New Zealand has assessed CFR 416.2 (a) which states "Pest control substances used must be safe an effective under the conditions of use and not be applied or stored in a manner that will result in the adulteration of product or the creation of insanitary conditions". New Zealand does not agree with the auditor's interpretation and application of the CFR requirements in prohibiting the use of secure and properly managed bait stations in the areas he identified.

8. For *E. coli* and *Salmonella* testing methods they stated they would supply a copy for equivalence determination of the methods of the NMD and MIRINZ 873, which are the methods they are using at the present time.

The auditor was supplied with a copy of MIRINZ 873. The NMD methods described are those that have been used since its inception, and were fully disclosed and assessed during FSIS equivalence determinations. Refer to Annex II for a summary of changes to the NMD.

9 Critical control points were not a measurable entity and were a judgement matter in all establishments. Tony Zohrab agreed that this issue needed further investigation and clarification and improved guidance provided to industry.

The primary focus for this comment was in relation to wool roll-in. Generic HACCP plans, Manual IS 5 Slaughter and Dressing, and a set of photographs provided for guidance when IS 5 was first issued relate to the job description for workers performing dressing operations. Correct methods for performing opening cuts and establishing limits of acceptability for roll-in are measurable parameters for these operations. These are primarily based upon scientific work performed by Biss and Hathaway in relation to microbial contamination of carcasses during dressing and the relationship to food safety. Refer to Annex IV.

10 In *Salmonella* testing, the carcass selection is done as the other half of the carcass that is selected for *E. coli* testing (which is not selected randomly). They stated that their procedure was equivalent and said they would provide supporting evidence.

Supporting evidence was provided to Dr Parks in a letter dated 20 June 2001.

11 The removal and discarding of small stock (sheep and goats) heads before inspection was discussed and Tony Zohrab said that an equivalence had been granted and that he would see if they could find the letter from the International Policy Staff concerning this matter and supply a copy.

MAF will provide a copy of a Telex communication on this subject. Also refer to page 46150, Federal Register Vol. 56, No 175, Tuesday, September 10, 1991: Docket = 91-009N. "Availability of Scientific Study of Post-Mortem Inspection Procedures for New Zealand Lambs".

PART 2

Comments on Draft Final Audit Report

Entrance Meeting

Page 2, paragraph 1: Dr Jeff Taylor; Dr Luke McLean.

Headquarters Audit

Page 4, 2nd bullet: The report states that "Carcasses are not being selected randomly for sampling". This statement does not adequately reflect the mandatory requirements of the NMD programme or the extent of premises random selection procedures.

The NMD has always required, and continues to require, that carcasses be selected randomly for sampling. The auditor was shown the relevant sections in the NMD procedures manual (amendment 2, sections 3.8.1.2 & 3.9.1) and confirmed the requirement.

All premises assessed during the audit, randomly select the class of stock to be sampled, the day of sampling, the shift of sampling and the run (2 hr processing period) from which the individual carcasses would be sampled.

However, in most cases the US Auditor noted that the carcasses sampled in a run were not selected according to a formal, documented, randomisation process. The Auditor agreed that selection was not deliberately biased, and the nature of processing in New Zealand would effectively result in randomisation.

Nevertheless, MAF Food considers premises implementation to be inadequate. As agreed with the US Auditor (draft report, page 12, point 6), the NMD procedures manual has been rewritten (amendment 3, section 3.9) to clarify and reiterate the requirements for random selection, documentation of the selection procedures and recording of selection results. Industry and government verifiers have been reminded of the requirements.

Compliance will not only be verified through MAF VA and MAF GIG audits but more importantly through ongoing analysis of sample times, etc provided to the NMD with the microbiological results.

Associated references: ***Page 8, point 1; page 10, point 1; page 12, point 6; page 12, point 10.***

Page 4, 3rd bullet: CFR 308.3 (h) Noted that prohibited poisons for any purpose in rooms or compartments where any unpackaged product is stored or handled. This section has been removed and now CFR 416.2 (a) states: "Pest control substances used must be safe and effective under the conditions of use and not be applied or stored in a manner that will result in the adulteration of product or the creation of insanitary conditions."

New Zealand does not interpret these requirements as prohibiting the use of secure and properly managed rodent bait stations within the confines of buildings, in support areas and other areas where food is either not handled nor in the unprotected state.

Page 4, 4th bullet:

Refer to Annex IV for the NZ response to "Critical Control Limits were not measurable; they were judgmental."

Government Oversight

Page 4: All inspection service veterinarians in establishments are government employees employed by MAF Verification Agency. Inspectors are employed by Asure NZ. Asure NZ is a government-owned State Owned Enterprise.

Animal Disease Controls

Page 6, paragraph 3: MAF Biosecurity Authority (MAF BA) is responsible for animal diseases, not Agriquality.

New Zealand has freedom from Brucellosis and Foot and Mouth Disease as recognised by OIE. New Zealand has a European Union GBR 1 classification with regard to Bovine Spongiform Encephalopathy. Agriquality are contracted to perform activities associated with the Tuberculosis eradication programme, and perform surveillance activities on behalf of MAF BA.

Slaughtering/Process Controls

Page 7, 1st paragraph: It is our understanding that ME 86 did have one internal rodent bait box located in the bulk carton store. Otherwise the rodent control programme included bait stations around the perimeter fence of the premises.

HACCP Implementation

Page 7, paragraph 3: Boning establishments have performed a hazard identification and analysis. but did not identify and critical control points and therefore do not have an HACCP plan.

New Zealand requested that FSIS provide a list of commonly identified hazards encountered in U.S. HACCP plans for this type of establishment This list has been received and an assessment as to how these hazards are being managed within New Zealand boning establishments is being performed. New Zealand gives an undertaking that it will ensure that stand alone boning and cutting premises certified for export to the U.S. will have a CCP identified by the end of June 2002.

Testing for Generic *E. coli*

Page 7, point 2: The statement that NZ cattle are sampled at the "outside hind leg" is factually incorrect. New Zealand samples a rump site (NMD amendment 3. section 3.7.4.3) as agreed with the US during equivalence determinations.

Testing for *Salmonella* species

Page 9, point 1: The statement that a non-government agency (MILAB) carries out laboratory accreditation is incorrect. MILAB is part of MAF Food.

Associated references: ***Page 9, point 2.***

Page 9, point 2: None of the laboratories used for *Salmonella* analysis are government laboratories. All are independent or premises laboratories and are accredited by MAF Food via the accreditation programme.

Page 10, 4th bullet: *Salmonella* test results are not reported directly from the laboratory to the MAF inspection personnel. Nevertheless. the premises must report all positive test results to the MAF inspector (NMD amendment 3. section 16.11.1). and ensure that all results are available to the inspector on request.

Page 10, point 2: *Salmonella* sampling by non-government (MAF) personnel is specifically permitted under the "equivalence agreement as long as they are properly trained according to NMD and MILAB requirements. and formally contracted/seconded to the responsible testing laboratory (NMD amendment 3. section 4.2.1.2). Collection of samples by Asure or other government personnel is not prohibited under the NMD programme.

We note that the report alludes to a conflict of interest situation arising if Asure or other government personnel take samples and are puzzled by the comment.

Monthly Reviews

Page 11, paragraph 1: Dr Chris Mawson; Dr Jeff Taylor.
paragraph 3: Drs Mawson or Taylor.

Enforcement Activities

Page 11, last paragraph: Refer to comment on Page 12, point 2 below.

Exit Meetings

Page 11, paragraph 1: Dr Geoff Allen, MAF Compliance Director.

Page 12, paragraph 1: Dr Phil Ward, MAF; (NB he has responsibility for market access to the EU).

Page 12, point 1: Hazard analysis did reveal hazards but no critical control points were identified. As these hazards were either not reasonably likely to occur, or were identified as uncontrolled hazards, or were managed through good manufacturing/good hygienic practices.

Page 12,point 2: MAF will provide documents explaining the legal instruments available for handling people convicted of a felony under the Animal Products Act 1999. (Refer to Annex II)

Page 12, point 6: Covered in comments above under Headquarters Audit.

Page 12, point 8: The US Auditor asked for, and was supplied with, a copy of the *E. coli* and *Salmonella* analytical methods from MIRINZ 873 (*Microbiological Methods for the Meat Industry*) from which the required NMD methods (Amendment 3, chapters 13 and 14) were derived.

E. coli: Petrifilm® *E. coli* method. AOAC® Official Method℠ 986.33.

Salmonella: Buffered peptone water pre-enrichment and Rappaport Vassiadis Soya enrichment method. Enhancement of the method described in *Microbiology - General Guidance on Methods for the Detection of Salmonella.* ISO 6579:1993E. AOAC® Official Method℠ 10.1.

The methods described have been used in the NMD programme since its inception, were fully disclosed in equivalence negotiations, and were assessed by the USDA Director of Microbiology in the 1998 audit.

The methods have subsequently been subjected to minor modifications in line with international directives and to eliminate procedural ambiguity. The modifications, listed in the attached document Annex III, entitled "*Summary of Amendments to the NMD Programme*", would not affect the sensitivity and specificity

of the analysis, and consequently approval by, or notification of, USDA was not considered necessary.

Page 12, point 10: Covered by comments under Headquarters Audit above.